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Of Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

**ADIDAS AMERICA, INC. and
ADIDAS AG,**

Plaintiffs,

v.

**PEDIPEP INFANT FOOTWEAR,
LLC.,**

Defendant.

CV '11 1187- PK
No. _____

**MOTION FOR LEAVE TO FILE
COMPLAINT UNDER SEAL**

By Plaintiffs adidas America, Inc. and
adidas AG

Pursuant to LR 3-8(c)

1- MOTION FOR LEAVE TO FILE COMPLAINT
UNDER SEAL

91004-0005/LEGAL21804243.1

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Pursuant to Local Rule 3-8(c), plaintiffs adidas America, Inc. and adidas AG (collectively, "adidas") respectfully move for leave to file under seal the contemporaneously-submitted Complaint.

The filing of the Complaint under seal is necessary because included within the Complaint are allegations related to a confidential settlement agreement previously entered into between the parties. In addition, a copy of the parties' prior settlement agreement is attached as an exhibit to the Complaint. Because this settlement agreement states that its terms are to remain confidential, adidas's Complaint in this matter must be filed under seal in order to avoid a breach of the confidentiality provision of the settlement agreement.

A proposed Order Sealing Complaint is being submitted concurrently herewith.

DATED: September 29, 2011

PERKINS COIE LLP

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Of Counsel for Plaintiffs

2- MOTION FOR LEAVE TO FILE COMPLAINT
UNDER SEAL

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